

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re :

LEHMAN BROTHERS HOLDINGS INC., *et al.*, :

Debtors. :

Chapter 11 Case No.

08-13555 (JMP)

(Jointly Administered)

-----X  
Ref. Docket No. 9721

**AFFIDAVIT OF SERVICE**

STATE OF NEW YORK )  
 ) ss.:  
COUNTY OF NEW YORK )

BRITTANY WHALEN, being duly sworn, deposes and says:

1. I am employed as a Noticing Coordinator by Epiq Bankruptcy Solutions, LLC, located at 757 Third Avenue, New York, New York 10017. I am over the age of eighteen years and am not a party to the above-captioned action.
2. On June 22, 2010, I caused to be served the:
  - a. "Notice of Fifty-Second Supplemental List of Ordinary Course Professionals," dated June 22, 2010 [Docket No. 9721], (the "Fifty-Second Supplemental Notice"),
  - b. Declaration and Disclosure Statement of Richard Hacker, related to Docket No. 9721, annexed hereto as Exhibit A, (the "Hacker Declaration"),
  - c. Declaration and Disclosure Statement of Robert Stuart Levy Q.C, related to Docket No. 9721, annexed hereto as Exhibit B, (the "Stuart Declaration"), and
  - d. Declaration and Disclosure Statement of Felicity Rosalind Toube, related to Docket No. 9721, annexed hereto as Exhibit C, (the "Toube Declaration"),

by causing true and correct copies of:

- a. the Fifty-Second Supplemental Notice, to be enclosed securely in separate postage pre-paid envelopes and delivered via overnight mail to those parties listed on the annexed Exhibit D,
- b. the Fifty-Second Supplemental Notice, to be delivered via email to those parties listed on the annexed Exhibit E,
- c. the Hacker Declaration and Toube Declaration, to be delivered via electronic mail to the party listed on the annexed Exhibit F, and

- d. the Stuart Declaration, to be delivered via electronic mail to the party listed on the annexed Exhibit G.
3. All envelopes utilized in the service of the foregoing contained the following legend:  
“LEGAL DOCUMENTS ENCLOSED. PLEASE DIRECT TO ATTENTION OF  
ADDRESSEE, PRESIDENT OR LEGAL DEPARTMENT.”

Sworn to before me this  
23<sup>rd</sup> day of June, 2010

/s/ Elli Petris

Notary Public, State of New York

No. 01PE6175879

Qualified in Nassau County

Commission Expires October 22, 2011

/s/ Brittany Whalen

Brittany Whalen

## **EXHIBIT A**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

|   |   |
|---|---|
| -----X  |   |
| <b>In re</b>                                  | : |
|   | : |
| <b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b> | : |
|   | : |
| <b>Debtors.</b>                               | : |
|   | : |
|   | : |
| -----X  |   |

**Chapter 11 Case No.  
08-13555 (JMP)  
(Jointly Administered)**

**DECLARATION AND DISCLOSURE STATEMENT OF RICHARD HACKER**

RICHARD HACKER declares and says:

1. I am a member of the Bar of England and Wales and a Queen's Counsel , practising as such as a sole practitioner at 3-4 South Square, Gray's Inn, London WC1R 5HP, England.
2. Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the "Debtors" and, collectively with their non-debtor affiliates, "Lehman"), have requested that I provide legal advice and representation to the Debtors, and I have consented to provide such services.
3. I may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of my customary practice, I am retained in cases, proceedings, and transactions involving many different parties,

some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases. I do not perform services for any such person in connection with these chapter 11 cases. In addition, I do not have any relationship with any such person, their attorneys, or accountants that would be adverse to the Debtors or their estates.

4. I have not agreed to share nor will share any portion of the compensation to be received from the Debtors with any other person.

5. I do not hold or represent any interest adverse to the Debtors or their estates.

6. The Debtors do not owe me any amount for prepetition services.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: London, England

26<sup>th</sup> May 2010

A handwritten signature in black ink, appearing to read 'Richard Hacker', is written over a horizontal line.

RICHARD HACKER

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
: **Chapter 11 Case No.**  
: **08-13555 (JMP)**  
: **(Jointly Administered)**  
: **Debtors.**  
: **LEHMAN BROTHERS HOLDINGS INC., et al.,**  
: **In re**  
-----X

**RETENTION QUESTIONNAIRE**

TO BE COMPLETED BY PROFESSIONALS EMPLOYED BY LEHMAN  
BROTHERS HOLDINGS INC. OR ANY OF ITS DEBTOR AFFILIATES (collectively,  
the "Debtors")

DO NOT FILE THIS QUESTIONNAIRE WITH THE COURT.  
RETURN IT FOR FILING BY THE DEBTORS, TO:

Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, New York 10153  
Attn: Jennifer Sapp  
Christopher Stauble

All questions **must** be answered. Please use "none," "not applicable," or "N/A," as  
appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address:

RICHARD HACKER, A MEMBER OF THE BAR OF ENGLAND AND  
WALES AND A QUEEN'S COUNSEL , PRACTISING AS SUCH AS A  
SOLE PRACTITIONER AT 3-4 SOUTH SQUARE, GRAY'S INN,  
LONDON WC1R 5HP, ENGLAND

2. Type of services provided (accounting, legal, etc.):

LEGAL

3. Brief description of services to be provided:

LEGAL ADVICE AND REPRESENTATION IN RELATION TO  
RIGHTS AND OBLIGATIONS EXISTING UNDER NOTES ISSUED  
BY EXCALIBUR FUNDING NO. 1 PLC

4. Arrangements for compensation (hourly, contingent, etc.)

HOURLY FOR ADVICE, AND POSSIBLE COMMITMENT OR LUMP  
SUM PAYMENTS IN RELATION TO COURT HEARINGS

- (a) Average hourly rate (if applicable):

GBP 900 – 950 (OR AS OTHERWISE AGREED)

- (b) Estimated average monthly compensation based on prepetition  
retention (if firm was employed prepetition):

N/A

5. Prepetition claims against the Debtors held by the firm:

Amount of claim: \$ N/A

Date claim arose: N/A

Source of Claim: N/A

6. Prepetition claims against the Debtors held individually by any member,  
associate, or professional employee of the firm:

Name: N/A

Status: N/A

Amount of Claim: \$ N/A

Date claim arose: N/A

Source of claim: N/A

7. Stock of the Debtors currently held :

Kind of shares: N/A

No. of shares: N/A

8. Stock of the Debtors currently held individually by any member, associate, or professional employee of the firm:

Name: N/A

Status: N/A

Kind of shares: N/A

No. of shares: N/A

9. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates with respect to the matters on which the above-named firm is to be employed.

N/A

11. Name of individual completing this form:

RICHARD HACKER



## **EXHIBIT B**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

|  |   |                        |
|--|---|------------------------|
| In re  | : | Chapter 11 Case No.    |
| LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> , | : | 08-13555 (JMP)         |
| Debtors.                                       | : | (Jointly Administered) |

**AFFIDAVIT AND DISCLOSURE STATEMENT OF ROBERT STUART LEVY Q.C.**

CITY OF LONDON )

COUNTY OF THE UNITED KINGDOM)

ROBERT STUART LEVY Q.C., being duly sworn, upon his oath, deposes and says:

1. I am a Queen's Counsel, called to the Bar of England and Wales and a member of Barristers Chambers known as New Square Chambers, 12 New Square, Lincoln's Inn, London WC2A 3SW.

2. Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the "Debtors" and, collectively with their non-debtor affiliates, "Lehman"), have requested that I provide legal services to the Debtors with respect to matters of UK law and in particular with respect to the position of the UK administrators and I have consented to provide such services.

3. I may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of its customary practice, I am retained in cases,

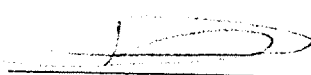
proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases. To the best of my knowledge I do not perform services for any such person in connection with these chapter 11 cases. In addition, the Firm does not have any relationship with any such person, their attorneys, or accountants that would be adverse to the Debtors or their estates.

4. I have not agreed to share and will not share any portion of the compensation to be received from the Debtors with any other person other than my regular expenses encountered with the administration of any barristers Chambers.

5. Insofar as I have been able to ascertain, I do not hold or represent any interest adverse to the Debtors or their estate.

6. I have not provided any pre-petition services to the Debtors.

7. If I should discover any facts bearing on the matters described herein, I will supplement the information contained in the Affidavit

By: 

Subscribed and sworn to before me  
17<sup>th</sup> day of May 2010



Notary Public

WILLIAM B. KENNAIR  
SCRIVENER NOTARY  
LONDON, ENGLAND

My commission is for life

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

|  |   |
|--|---|
| -----X   |   |
| In re  | : |
|  | : |
| LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> , | : |
|  | : |
| Debtors.                                       | : |
|  | : |
|  | : |
| -----X   |   |

Chapter 11 Case No.  
08-13555 (JMP)  
(Jointly Administered)

**RETENTION QUESTIONNAIRE**

TO BE COMPLETED BY PROFESSIONALS EMPLOYED BY LEHMAN BROTHERS HOLDINGS INC. OR ANY OF ITS DEBTOR AFFILIATES (collectively, the "Debtors")

DO NOT FILE THIS QUESTIONNAIRE WITH THE COURT.  
RETURN IT FOR FILING BY THE DEBTORS, TO:

Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, New York 10153  
Attn: Jennifer Sapp  
Christopher Stauble

All questions **must** be answered. Please use "none," "not applicable," or "N/A," as appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address of firm:

ROBERT LEVY Q.C.

NEW SQUARE CHAMBERS, 12 NEW SQUARE

LINCOLN'S INN

LONDON WC2A 3SW

2. Date of retention: 14 AUGUST 2009

3. Type of services provided (accounting, legal, etc.):

LEGAL

4. Brief description of services to be provided:

LEGAL ADVICE AND REPRESENTATION AS IS NORMMALLY  
PROVIDED BY BARRISTERS, IN PARTICULAR WITH REGARD TO  
THE POSISTION OF THE UK ADMINISTRATORS

5. Arrangements for compensation (hourly, contingent, etc.)

HOURLY

- (a) Average hourly rate (if applicable):

GBP 300

- (b) Estimated average monthly compensation based on prepetition retention (if firm was employed prepetition):

N/A

6. Prepetition claims against the Debtors held by the firm:

Amount of claim: \$ NONE

Date claim arose: N/A

Source of Claim: N/A

7. Prepetition claims against the Debtors held individually by any member, associate, or professional employee of the firm:

Name: N/A

Status: N/A

Amount of Claim: \$ ZERO

Date claim arose: N/A \_\_\_\_\_

Source of claim: N/A \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

8. Stock of the Debtors currently held by the firm:

Kind of shares: NONE \_\_\_\_\_

No. of shares: NONE \_\_\_\_\_

9. Stock of the Debtors currently held individually by any member, associate, or professional employee of the firm:

Name: N/A \_\_\_\_\_

Status: N/A \_\_\_\_\_

\_\_\_\_\_

Kind of shares: N/A \_\_\_\_\_

No. of shares: N/A \_\_\_\_\_

10. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates with respect to the matters on which the above-named firm is to be employed.

NONE \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

11. Name of individual completing this form:

ROBERT LEVY Q.C.

## **EXHIBIT C**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

|  |   |                        |
|--|---|------------------------|
| -----X   | : |                        |
| In re  | : | Chapter 11 Case No.    |
|  | : |                        |
| LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> , | : | 08-13555 (JMP)         |
|  | : |                        |
| Debtors.                                       | : | (Jointly Administered) |
|  | : |                        |
| -----X   | : |                        |

**DECLARATION AND DISCLOSURE STATEMENT OF FELICITY ROSALIND  
TOUBE**

FELICITY ROSALIND TOUBE declares and says:

1. I am a member of the Bar of England and Wales, practising as such as a sole practitioner at 3-4 South Square, located at 3-4 South Square, Grays Inn, London WC1R 5HP, United Kingdom.
2. Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the "Debtors" and, collectively with their non-debtor affiliates, "Lehman"), have requested that I provide legal advice and representation to the Debtors in connection with the administration of LB UK RE Holdings Limited (including the Debtors' interests in LB UK RE Holdings as its largest creditor) and other related matters, and I have consented to provide such services.
3. I may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of my customary practice, I am retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or



be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases. I do not perform services for any such person in connection with these chapter 11 cases. In addition, I do not have any relationship with any such person, their attorneys, or accountants that would be adverse to the Debtors or their estates with respect to the matters for which I seek to be retained.<sup>1</sup>

4. I have not agreed to share nor will share any portion of the compensation to be received from the Debtors with any other person.

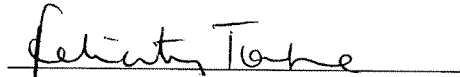
5. As far as I am aware, I do not hold or represent any interest adverse to the Debtors or their estates.

6. The Debtors do not owe me any amount for prepetition services.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: London, England

MAY 27, 2010



[DECLARANT'S NAME]

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<sup>1</sup> I represent certain parties on matters where they are or may be (or may become) adverse to the Debtors. However, those matters are unrelated to my representation of the Debtors. A list of those parties is attached hereto as Attachment 1.

ATTACHMENT 1

- Autonomy Capital Research LLP
- DE Shaw
- Royal Bank of Scotland
- Contrarian Fund
- MKM Longboat Multi Strategy Master Fund Limited
- CRC Credit Fund, Limited
- Barclays Bank
- ELQ Hypotheken NV

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
:  
**In re** : **Chapter 11 Case No.**  
:  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (JMP)**  
:  
**Debtors.** : **(Jointly Administered)**  
:  
:  
-----X

**RETENTION QUESTIONNAIRE**

TO BE COMPLETED BY PROFESSIONALS EMPLOYED BY LEHMAN BROTHERS HOLDINGS INC. OR ANY OF ITS DEBTOR AFFILIATES (collectively, the "Debtors")

DO NOT FILE THIS QUESTIONNAIRE WITH THE COURT.  
RETURN IT FOR FILING BY THE DEBTORS, TO:

Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, New York 10153  
Attn: Jennifer Sapp  
Christopher Stauble

All questions **must** be answered. Please use "none," "not applicable," or "N/A," as appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address of firm:

Felicity Toubé  
3-4 South Square,  
Gray's Inn, London. WC1R 5HP  
United Kingdom

2. Date of retention: 13 May 2010

3. Type of services provided (accounting, legal, etc.): Legal

4. Brief description of services to be provided:

Advising on and drafting re: CVA proposal for LB UK RE Holdings

5. Arrangements for compensation (hourly, contingent, etc.)

Hourly

- (a) Average hourly rate (if applicable):

£350 per hour

- (b) Estimated average monthly compensation based on prepetition retention (if firm was employed prepetition):

N/A

6. Prepetition claims against the Debtors held by the firm:

Amount of claim: \$0

Date claim arose: N/A

Source of Claim: N/A

7. Prepetition claims against the Debtors held individually by any member, associate, or professional employee of the firm:

Name: N/A

Status:

Amount of Claim: \$

Date claim arose:

Source of claim:

8. Stock of the Debtors currently held by the firm:

Kind of shares: None \_\_\_\_\_

No. of shares: None \_\_\_\_\_

9. Stock of the Debtors currently held individually by any member, associate, or professional employee of the firm:

Name: None \_\_\_\_\_

Status: N/A \_\_\_\_\_

Kind of shares: N/A \_\_\_\_\_

No. of shares: N/A \_\_\_\_\_

10. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates with respect to the matters on which the above-named firm is to be employed.

I represent certain parties on matters where they are or may be (or may become) adverse to the Debtors. However, those matters are unrelated to my representation of the Debtors and a list of those parties is attached to my disclosure statement as Attachment 1.

11. Name of individual completing this form:

Felicity Toubé

## **EXHIBIT D**

OFFICE OF THE US TRUSTEE  
ANDREW D VELEZ-RIVERA, PAUL SCHWARTZBERG  
BRIAN MASUMOTO, LINDA RIFKIN, TRACY HOPE DAVIS  
33 WHITEHALL STREET, 21ST FLOOR  
NEW YORK, NY 10004

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK  
ATTN: THE HONORABLE JAMES M. PECK  
ONE BOWLING GREEN, COURTROOM 601  
NEW YORK, NY 10004

## **EXHIBIT E**



**Exhibit A - Counsel To The Official Committee Of Unsecured Creditors**

MILBANK, TWEED, HADLEY & MCCLOY LLP  
DENNIS DUNNE, LUC DESPINS, WILBUR FOSTER, JR  
DENNIS O'DONNELL, ESQ., EVAN FLECK, ESQ.  
(COUNSEL TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS)  
1 CHASE MANHATTAN PLAZA  
NEW YORK, NY 10005  
EMAIL: ddunne@milbank.com; wfoster@milbank.com, dodonnell@milbank.com,  
efleck@milbank.com

MILBANK, TWEED, HADLEY & MCCLOY, LLP  
ATTN: PAUL ARONZO & GREGORY BRAY  
(COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS)  
601 SOUTH FIGUEROA STREET, 30TH FLOOR  
LOS ANGELES, CA 90017  
EMAIL: paronzon@milbank.com; gbray@milbank.com

## **EXHIBIT F**

MRadoycheva@gibsondunn.com

## **EXHIBIT G**

Neil.Garrett@NewSquareChambers.co.uk